

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 15-cr-20382

v.

HONORABLE VICTORIA A. ROBERTS

D-1 PAUL NICOLETTI,

Defendant.

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**STIPULATION FOR A PROTECTIVE ORDER  
REGARDING PRODUCTION OF FINANCIAL, BANKING,  
TAX AND OTHER RECORDS CONTAINING PERSONALLY  
IDENTIFIABLE AND OTHER SENSITIVE INFORMATION**

Plaintiff, the United States of America, by its attorneys, Barbara L. McQuade, United States Attorney, and Craig A. Weier, Assistant United States Attorney, both for the Eastern District of Michigan, together with D-1 PAUL NICOLETTI, through his attorney, John Minock, Esq., hereby stipulate to the entry of a Protective Order with respect to the production of financial, banking and other records containing personally identifiable information [PII] and other sensitive information in this criminal proceeding.

1. The indictment in this case includes charges of Conspiracy to Commit Bank Fraud and Bank Fraud;

2. During the course of the underlying investigation, the United States obtained tax, financial and banking records as well as other documents containing personally identifiable information and other sensitive information, consisting of thousands of pages of materials relating to parties and non-parties.

Therefore, the government and the defendants stipulate that:

3. Given the nature of the underlying charges, in order to provide meaningful discovery of the subject materials, the defendant will need to examine those materials in their original form, without redactions.

4. In addition, given the volume of discovery materials, the review and redaction of information from individual documents would be unnecessarily burdensome and would result in significant delays in making the subject materials available to defendant.

5. Therefore, the parties agree that a protective order will allow for the subject information to be produced in its original form and further agree that the documents produced pursuant to the protective order *will only be disclosed to, and reviewed by, the defendant, his counsel of record, and investigators and experts retained by defense counsel for consultation, as well as defense counsel's support staff.* No person shall provide or

disseminate those materials or the information contained in those materials to any party not specifically described in the protective order and any unauthorized disclosure would constitute a violation of the Court's Order.

6. Any filing that includes or refer to any of the subject records, which filing contain social security numbers, tax identification numbers, dates of birth, the names of individuals known to be minors, financial accounts or home addresses of parties or non-parties, shall be filed in compliance with Rule 49.1 of the Federal Rules of Criminal Procedure and the Electronic Filing Policies and Procedures of the United States District Court for the Eastern District of Michigan.

WHEREFORE, for all the foregoing reasons, the parties respectfully request that this Court enter a Protective Order allowing the government to produce unredacted copies of financial, banking and other records containing personally identifiable information [PII] and other sensitive information to defendant, through his counsel of record in this proceeding, and restricting the use of the documents

and information as provided above.

So stipulated and respectfully submitted,

BARBARA L. McQUADE  
United States Attorney

s/CRAIG A. WEIER (P33261)  
Assistant United States Attorney  
211 W. Fort Street, Suite 2001  
Detroit, MI 48226  
Phone: (313) 226-9678  
E-Mail: craig.weier@usdoj.gov

s/JOHN R. MINOCK, ESQ. (P24626)  
Attorney for D-1 Paul Nicoletti  
Cramer Minock & Sweeney PLC  
339 E Liberty St Ste 200  
Ann Arbor, MI 48104-2258  
Phone: (734) 668-2200  
E-Mail: jminock@cramerminock.com

***IT IS SO ORDERED.***

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VICTORIA A. ROBERTS  
UNITED STATES DISTRICT JUDGE  
EASTERN DISTRICT OF MICHIGAN